

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:
	:
Debtors.	:
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Chapter 11
Case No. 08-13555 (SCC)
(Jointly Administered)

[PROPOSED] STIPULATED CLAIMS LITIGATION AND PRE-TRIAL SCHEDULE

WHEREAS, on February 11, 2015, the Court so-ordered the Parties' stipulated Claims Litigation Schedule for the Objection of Debtors and Debtors in Possession to the Claims of QVT Fund LP and Quintessence Fund L.P. [Docket No. 48190];

WHEREAS, on October 19, 2015, the Court so-ordered the Parties' stipulated Revised Second Stipulated Claims Litigation Schedule [Docket No. 51209];

WHEREAS, on September 20, 2016, the Court so-ordered the Parties' stipulated Revised Third Stipulated Claims Litigation Schedule [Docket No. 53687] (the "Claims Litigation Schedule");

WHEREAS, the Parties have met and conferred and agreed to modify various deadlines in the Claims Litigation Schedule and add additional pre-trial deadlines,

NOW, THEREFORE, the Parties hereby stipulate and agree to modify the Claims Litigation Schedule as follows:

1. Responses to Interrogatories served pursuant to Local Bankruptcy Rule 7033-1(c) and responses to requests for admissions will be served on or before November 10, 2016.

2. Depositions of experts previously disclosed by QVT Fund LP and Quintessence Fund L.P. (collectively, “QVT”) must be completed no later than November 14, 2016.

3. Debtors shall disclose the identities of any of their testifying expert witnesses and serve any expert reports pursuant to Federal Rule of Civil Procedure 26(a)(2)(B) on November 22, 2016.

4. Depositions of experts disclosed pursuant to paragraph 3 must be completed no later than December 20, 2016.

5. The parties shall serve any rebuttal expert reports on January 3, 2017, except that any rebuttal expert report submitted by a representative of CMRA shall be served by January 6, 2017.

6. The deadline for the parties to exchange deposition designations shall be January 6, 2017.

7. The deadline for the parties to exchange witness lists shall be January 9, 2017.

8. The deadline for the parties to exchange exhibit lists and proposed exhibits shall be January 9, 2017.

9. The deadline for the parties to exchange objections to proposed exhibits shall be January 13, 2017.

10. The deadline for the parties to exchange deposition counter-designations shall be January 13, 2017.

11. Depositions of experts disclosed pursuant to paragraph 5 must be completed no later than January 17, 2017.

12. The deadline for the parties to submit consolidated pre-hearing briefs (including *Daubert* and *in limine* arguments), which are subject to a 60 page limit, shall be January 18, 2017.

13. The deadline for the parties to exchange a proposed joint statement of uncontested facts shall be January 20, 2017.

14. The deadline for the parties to submit pre-hearing reply briefs, which are subject to a 30 page limit, shall be January 25, 2017.

15. The deadline for the parties to submit a joint statement of uncontested facts shall be January 26, 2017.

16. The deadline for the parties to submit final witness lists to the Court shall be January 26, 2017.

17. The deadline for the parties to submit exhibit lists and pre-marked exhibits, including joint exhibits, to the Court shall be January 27, 2017.

18. The deadline for the parties to submit witness lists, including witness order, to the Court shall be January 27, 2017.

19. The final pretrial conference shall be held on January 27, 2017.

20. The Claims Hearing regarding the Claims of QVT shall commence on January 30, 2017.

21. The deadline to submit deposition designations to the Court shall be March 9, 2017.

Dated: November 2, 2016
New York, New York

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Dated: _____, 2016
New York, New York

SO ORDERED

UNITED STATES BANKRUPTCY JUDGE